

**INITIAL STATEMENT OF REASONS
FOR
PROPOSED BUILDING STANDARDS
OF THE
OFFICE OF STATEWIDE HEALTH PLANNING AND DEVELOPMENT**

**REGARDING THE CALIFORNIA BUILDING STANDARDS ADMINISTRATIVE CODE,
CALIFORNIA CODE OF REGULATIONS, TITLE 24, PART 1, CHAPTER 7**

SUBJECT: Project Plan Submittal, Hospital Inspector Certification, and Clinic Review

The Administrative Procedure Act (APA) requires that an Initial Statement of Reasons be available to the public upon request when rulemaking action is being undertaken. The following information required by the APA pertains to this particular rulemaking action:

STATEMENT OF SPECIFIC PURPOSE AND RATIONALE:
Part 1, Chapter 7

Section 7-113 (a) (2) (B) & (C) and Section 7-115 (a) The proposed amendments describe acceptable dimensions for construction plans/drawings submitted to the Office and a maximum weight for bundled sets of plans/drawings. Large and heavy sets of plans require special handling by the Office staff during intake, plan review and shipping which can cause delays in the review process. Additionally, handling heavy cumbersome sets of plans increases the potential risk for personal injury.

Establishing plan size and weight standards will increase efficiency in the handling of construction plans and reduce the risk of injury to OSHPD staff. The proposed plan size limitation of 36" X 48" inches will provide plans that are large enough to read legibly and can be handled efficiently. Plans larger than these dimensions require larger workspace and deeper counter space for plan reviewers and for more floor space for storage and archiving (plan racks deeper than 36 inches require more floor space). Also, when plans are reviewed for backchecks there must be enough space to accommodate two sets of plans (comment set and revised set).

In addition, handling and lifting large heavy sets of plans for shipping or for transporting to various locations within the office is difficult and cumbersome for staff. The maximum weight limit of 40 lbs. is being proposed because the OSHPD support staff and plan review staff duty statements restrict lifting of objects to no more than 40 lbs.

Sections 7-204 (c)(2) & (3) The minimum qualifications for the Class "C" Hospital Inspector Certification exam require that the applicant must possess a valid certificate in a specific construction specialty. It is not clear in the existing code language that a licensed engineer or architect applying for the exam must also possess such a certificate. The proposed amendment is for clarification. Additionally, proposed amendments to (c) (2) will clarify that the specified minimum qualifications are applicable to licensed/registered engineers that are not specified in (c) (3).

Section 7-206 (b) & (c) An applicant of the Class "C" Hospital Inspector Certification exam may apply for certification to inspect in one or more areas of construction specialty. The proposed amendment will clarify that the applicant must pay a \$100 exam fee for each specialty they apply for.

Section 7-207 (e) The administrative section of the Class "A", "B" and "C" exams is the same for each exam. This section is updated approximately every three years. The proposed amendment will clarify that when a candidate for any hospital inspector certification exam passes the administrative section of the exam, they will not have to retake this section if they sit for another exam within the three years.

Section 7-2104 (a) & (b) The proposed amendment will implement statute enacted by SB 224 (Chapter 494, Statute of 2005) which mandates that the Office will perform plan review and construction observation of a clinic building, in lieu of the local building department, if a hospital owner requests it.

TECHNICAL, THEORETICAL, AND EMPIRICAL STUDY, REPORT, OR SIMILAR DOCUMENTS:

There are no technical, theoretical and empirical studies, reports or other documents to be identified regarding the development of these proposed regulations.

CONSIDERATION OF REASONABLE ALTERNATIVES

There were no alternatives considered by the Office. The proposed code changes are technical modifications that will provide clarification and will implement statute.

REASONABLE ALTERNATIVES THE AGENCY HAS IDENTIFIED THAT WOULD LESSEN ANY ADVERSE IMPACT ON SMALL BUSINESS.

The proposed regulations will not adversely impact small businesses.

FACTS, EVIDENCE, DOCUMENTS, TESTIMONY, OR OTHER EVIDENCE OF NO SIGNIFICANT ADVERSE IMPACT ON BUSINESS.

The scope of the proposed code changes is to make technical modifications for clarity and to implement statute. These regulations will have no significant adverse impact of businesses.

DUPLICATION OR CONFLICTS WITH FEDERAL REGULATIONS

N/A